

# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

February 23, 2012

Certified Mail Return Receipt Requested

Mr. Corey Vodvarka  
Plant Manager  
Exide Technologies (ID# 124838)  
2700 S. Indiana St.  
Vernon, CA 90058

Dear Mr. Vodvarka:

In a letter dated April 6, 2011 (see enclosed), the South Coast Air Quality Management District (AQMD) informed you that for Compliance Year 2010, your facility's reported NOx emissions exceeded your Allocations by a total of 1,769 pounds and Notice of Violation #P55520 was issued. However, based on a subsequent audit of your facility's records for Compliance Year 2010 and all information available to us, staff's assessment concluded that NOx emissions from your facility for the period of January 1, 2010 through December 31, 2010 exceeded your Allocations in the last quarter as follows:

Quarter	Year-to-Date NOx Emissions (lbs)	Available NOx RTCs (lbs) as of the end of the Quarterly Reconciliation Period			Exceed/Comply	Amount Exceeded By Quarter (lbs)
		NOx RTCs exp. Jun-10	NOx RTCs exp. Dec-10	NOx RTCs exp. Jun-11		
First (1/10-3/10)	16,264	26,100	32,638	(0) Not Available For This Quarter	Comply	None
Second (4/10-6/10)	33,697	26,100	32,638	(0) Not Available For This Quarter	Comply	None
Third (7/10-9/10)	51,198	26,100	32,638	0	Comply	None
Last (10/10-12/10)	67,543	26,100	37,138	0	Exceed	4,305

As a result, your facility is in violation of Rule 2004(b)(4), which requires a facility to have acquired and have credited to the facility sufficient RECLAIM Trading Credits (RTCs) to reconcile its quarterly emissions, in the last quarter, as well as Rule 2004(d)(1), which prohibits a facility's emissions from exceeding its annual Allocations from the beginning of a compliance year through the end of any quarter, in the last quarter.

The reasons for the difference between Exide's reported and audited emissions were Exide not reporting 3 hours of NOx Missing Data, not reporting emissions from Rule 219 equipment, and arithmetic errors due to using the incorrect totals for operating parameters.

Mr. Corey Vodvarka  
Exide Technologies  
February 23, 2012  
Page 2

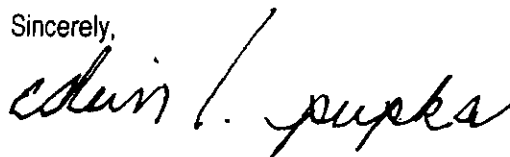
In order to account for the revised exceedance amount of 4,305 pounds based on the audit, 2536 pounds (4,305 – 1,769) is hereby deducted from your Compliance Year 2013 NOx Allocation (Coastal RTCs with expiration date of December 31, 2013). The deducted amount should be taken into account when you reconcile your NOx emissions with your Allocation for the 2013 compliance year.

You paid emissions fees based on NOx emissions reported in your Compliance Year 2010 APEP report. Fees for emissions, as determined above in excess of the amount reported in your APEP report, will be charged pursuant to AQMD Rule 301(I)(10)(C). Please recalculate and submit, if any, the amount of fees due based on your Compliance Year 2010 excess emissions, pursuant to Rule 301. Furthermore, please resubmit the revised Annual Emissions Report (AER) forms for the affected fiscal year(s) within 60 days from the date of this letter. Both the recalculated fees and resubmitted AER forms should be sent to:

South Coast Air Quality Management District  
Annual Emissions Reporting Program  
21865 Copley Drive  
Diamond Bar, CA 91765

If you have any emissions-related questions regarding the audit, please contact Mr. David Jones at (909) 396-2317. Otherwise, if you have any questions regarding the fee payment, the fee schedule, or any late payment penalties, please contact the Annual Emissions Reporting group at (909) 396-3660.

Sincerely,



Edwin L. Pupka  
Senior Enforcement Manager  
Air Toxics & Refinery/Energy/So Bay Industrial Team  
Engineering & Compliance

EP:DJ:rm

cc: RECLAIM Administration  
Nancy Feldman



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
21865 Copley Drive, Diamond Bar, CA 91765

Title Page	
Facility ID:	124838
Revision #:	26
Date:	March 22, 2012

## FACILITY PERMIT TO OPERATE

**EXIDE TECHNOLOGIES  
2700 S INDIANA ST  
VERNON, CA 90058**

### NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.  
EXECUTIVE OFFICER

By   
for Mohsen Nazemi, P.E.  
Deputy Executive Officer  
Engineering & Compliance

## **FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES**

### **TABLE OF CONTENTS**

<b>Section</b>	<b>Description</b>	<b>Revision #</b>	<b>Date Issued</b>
A	Facility Information	2	03/25/2011
B	RECLAIM Annual Emission Allocation	16	03/22/2012
C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	4	07/28/2011
E	Administrative Conditions	1	03/25/2011
F	RECLAIM Monitoring and Source Testing Requirements	1	03/25/2011
G	Recordkeeping and Reporting Requirements for RECLAIM Sources	1	03/25/2011
H	Permit To Construct and Temporary Permit to Operate	8	07/28/2011
I	Compliance Plans & Schedules	3	01/27/2012
J	Air Toxics	1	03/25/2011
K	Title V Administration	1	03/25/2011
<b>Appendix</b>			
A	NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	1	03/25/2011
B	Rule Emission Limits	1	03/25/2011



## FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

### SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NO<sub>x</sub> RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO<sub>x</sub> emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

#### RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year		Zone	NO <sub>x</sub> RTC Initially Allocated	NO <sub>x</sub> RTC <sup>1</sup> Holding as of 03/22/2012 (pounds)	Non-Tradable <sup>2</sup> Non-Usable RTCs (pounds)
Begin (month/year)	End				
7/2009	6/2010	Coastal	0	0	0
1/2010	12/2010	Coastal	65633	0	5316
1/2011	12/2011	Coastal	65633	70866	7088
1/2012	12/2012	Coastal	65633	69097	7088
1/2013	12/2013	Coastal	65633	68330	7088
1/2014	12/2014	Coastal	65633	70866	7088
1/2015	12/2015	Coastal	65633	70866	7088
1/2016	12/2016	Coastal	65633	70866	7088
1/2017	12/2017	Coastal	65633	70866	7088
1/2018	12/2018	Coastal	65633	70866	7088
1/2019	12/2019	Coastal	65633	70866	7088
1/2020	12/2020	Coastal	65633	70866	7088
1/2021	12/2021	Coastal	65633	70866	7088
1/2022	12/2022	Coastal	65633	70866	7088
1/2023	12/2023	Coastal	65633	70866	7088
1/2024	12/2024	Coastal	65633	70866	7088
1/2025	12/2025	Coastal	65633	70866	7088

#### Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

## **FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES**

### **SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION**

The annual allocation of NO<sub>x</sub> RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO<sub>x</sub> emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

#### **RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)**

Year		Zone	NO <sub>x</sub> RTC Initially Allocated	NO <sub>x</sub> RTC <sup>1</sup> Holding as of 03/22/2012 (pounds)	Non-Tradable <sup>2</sup> Non-Usable RTCs (pounds)
Begin	End				
(month/year)					
1/2026	12/2026	Coastal	65633	70866	7088
1/2027	12/2027	Coastal	65633	70866	7088

#### **Footnotes:**

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



## FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

### SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of SOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total SOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

#### RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year		Zone	SOx RTC Initially Allocated	SOx RTC <sup>1</sup> Holding as of 03/22/2012 (pounds)	Non-Tradable <sup>2</sup> Credits (NTCs) (pounds)
Begin	End				
(month/year)					
1/2010	12/2010	Coastal	102996	22763	
1/2011	12/2011	Coastal	102996	82996	
1/2012	12/2012	Coastal	102996	82996	
1/2013	12/2013	Coastal	102996	82996	
1/2014	12/2014	Coastal	102996	82996	
1/2015	12/2015	Coastal	102996	82996	
1/2016	12/2016	Coastal	102996	82996	
1/2017	12/2017	Coastal	102996	82996	
1/2018	12/2018	Coastal	102996	82996	
1/2019	12/2019	Coastal	102996	82996	
1/2020	12/2020	Coastal	102996	82996	
1/2021	12/2021	Coastal	102996	82996	
1/2022	12/2022	Coastal	102996	82996	
1/2023	12/2023	Coastal	102996	82996	
1/2024	12/2024	Coastal	102996	82996	
1/2025	12/2025	Coastal	102996	82996	
1/2026	12/2026	Coastal	102996	82996	

#### Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (h)(2) of Rule 2002.

## FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

### SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of SO<sub>x</sub> RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total SO<sub>x</sub> emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

#### RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year		Zone	SO <sub>x</sub> RTC Initially Allocated	SO <sub>x</sub> RTC <sup>1</sup> Holding as of 03/22/2012 (pounds)	Non-Tradable <sup>2</sup> Credits (NTCs) (pounds)
Begin (month/year)	End				
1/2027	12/2027	Coastal	102996	82996	

#### Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (h)(2) of Rule 2002.





## FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES

### SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	NOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
1/1994	12/1994	Coastal	120555	0

## **FACILITY PERMIT TO OPERATE EXIDE TECHNOLOGIES**

### **SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION**

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	SOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
1/1994	12/1994	Coastal	163915	0